

DECLARATION OF PETER KRISTOFER STROJNIK

Peter Kristofer Strojnik declares under penalty of perjury as follows:

1. I am competent to testify as to all of the facts set forth herein and will so testify if called upon to do so. I have personal knowledge of the matters set forth herein, based upon my observations and personal participation in the events described below.

2. I am an attorney and represent the Plaintiff in the above case.

3. I write this Declaration in response to the Court's OSC re Unruh Jurisdiction.

4. My client is seeking \$4,000.00 in Unruh damages in this case.

5. In the past twelve months, I have represented one ADA plaintiff who has alleged construction accessibility barriers through the filing of federal complaints, with a one-case exception.

6. Pursuant to CCP 425.55(b)(2), I am not a high-frequency litigant because I do not meet the 10-plaintiff threshold. In the past twelve months, I have only represented one person who alleges construction accessibility cases, and that is Theresa Brooke. The statute says an attorney is a high frequency litigant if he has "represented as attorney of record 10 or more high-frequency litigant plaintiffs." I have represented only Mrs. Brooke in ADA access cases, with one exception.

7. I declare the foregoing is true and correct under the penalty of perjury to the best of my knowledge, recollection and information.

Further the declarant sayeth naught.

DATED this 5th day of June, 2025.



Peter Kristofer Strojnik